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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE UKG INC CYBERSECURITY  
LITIGATION

Master Docket No. 3:22-cv-00346-SI

CLASS ACTION

THIS DOCUMENT RELATES TO:

All actions

**STIPULATION TO CONTINUE FILING  
DEADLINE FOR MOTION FOR  
PRELIMINARY APPROVAL &  
[PROPOSED] ORDER**

New Date: June 2, 2023  
Time: 10:00 a.m.  
Judge: Hon. Susan Illston  
Courtroom: 1, 17<sup>th</sup> Floor (via Zoom)

1 WHEREAS, the parties have agreed to a settlement in principle in this matter (*see* Docket  
2 Item No. 53);

3 WHEREAS, on March 7, 2023, the Court indicated the parties should file a motion for  
4 preliminary approval of the settlement by Friday, March 24, 2023 (*see* Docket Item No. 65);

5 WHEREAS, the parties continue to coordinate with each other and the settlement  
6 administrator to address the remaining issues of an administration and notice plan, which must  
7 be finalized before the motion for preliminary approval is filed;

8 NOW, THEREFORE, the parties hereby stipulate and agree that: (1) the motion for  
9 preliminary approval shall be filed on or before April 28, 2023, and (2) the motion for  
10 preliminary approval shall be heard by the Court on June 2, 2023.

11 IT IS SO STIPULATED.

12 Respectfully Submitted,

13 Dated: March 23, 2023

14 **SHOOK, HARDY & BACON LLP**

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Dated: March 23, 2023

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Dated: March 23, 2023

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Dated: March 23, 2023

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*Counsel for Plaintiff Cindy J. Villanueva*

**PROPOSED ORDER**

The Court, having considered the stipulation and, good cause appearing, hereby orders as follows:

1. The Motion for Preliminary Approval of Class Action Settlement Agreement shall be filed on or before April 28, 2023.
2. The hearing on the Motion for Preliminary Approval of Class Action Settlement Agreement shall be June 2, 2023.

IT IS SO ORDERED.

Dated: March \_\_, 2023

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Hon. Susan Illston  
United States District Judge

**FILER'S ATTESTATION OF CONCURRENCE**

I, Tammy B. Webb, pursuant to Local Rule 5-1-(i), attest that I am counsel for Defendant UKG Inc. As the ECF user and filer of this document, I attest that concurrence in the filing of this document has been obtained from its signatories.

Dated: March 23, 2023

SHOOK, HARDY & BACON, LLP

By: /s/ Tammy B. Webb

Tammy B. Webb